

Letter O-17 Environmental Center of San Diego

- O-17-1** The County acknowledges and appreciates the comment. It will be included as part of the FEIR and considered by the decision makers. However, the comment provides general introductory information that does not raise any issue or include any substantive comment with regard to the adequacy of the DEIR. For that reason, the County provides no further response to this comment.
- O-17-2** The County disagrees with the commenter as to the adequacy of the EIR's QCB analysis. The comment expresses a general concern over the EIR's impact assessments, and criticizes the EIR's treatment of impacts to QCB and to wildlife corridors. The comment, however, does not describe what aspects of the QCB analysis are deficient or explain why the commenter believes the EIR "misrepresents" the wildlife corridors on or near the Project site. The EIR describes existing QCB habitat onsite, discloses the Project's impacts on that habitat, and then explains how those impacts will be mitigated. (See DEIR Section 2.3.2.3, page 2.3-19.) Please see Responses to Comments A-1-9 and A-1-10 regarding analysis of QCB.

Regarding wildlife corridors, the County disagrees that the DEIR misrepresents the wildlife corridors. The EIR provides a similar discussion of Project impacts on wildlife corridors (DEIR Section 2.3.1.4, page 2.3-7; Section 2.3.2.4, pages 2.3-25—2.3-26.) Moreover, the description of those wildlife corridors is accurate and not a "misrepresentation," as suggested by the commenter. (*Ibid.*). The redesign of the Project also included the creation of two significant wildlife corridors/linkages connecting to Lower Otay Lake, the City of San Diego's MSCP Cornerstone Lands in and around the reservoir, and large blocks of preserve land to the south and east of the Project site. The wildlife corridors were enhanced with oversized culverts underneath the Project's interior backbone road, Strada Piazza, and underneath Otay Lakes Road to provide below-grade crossings for wildlife to reach the reservoir and the surrounding preserve lands mentioned above (please see Section 4.3 and Figures 13 through 18 in the Biological Resources Technical Report).

- O-17-3** The commenter expressed concerns that the DEIR is missing any acceptable mitigation measures for the alternatives. The comment, however, does not explain why the mitigation measures currently set forth in the Alternatives section of the EIR are not acceptable. The County disagrees that the mitigation measures for the various alternatives are inadequate. The Project alternatives were selected based on avoiding or reducing impacts of the proposed Project. Therefore, where impacts are the same for both the proposed Project and the Alternative, the mitigation measures identified for the proposed Project would apply to the Alternative as well. The exception is Alternative B (Existing Otay SRP), which results in certain impacts greater than the proposed Project; however, these impacts remain significant and unavoidable as were identified for the proposed Project. As well, Alternative B would not meet the Project objectives and is not anticipated to be selected. Table 4.0-1 compares the impacts of the proposed Project to the Alternatives.

Additionally, the commenter expressed concern that the DEIR is missing detailed analysis of cumulative impacts that will contribute to fracturing the habitat for QCB. The County provided a list of projects within the cumulative analysis study area for the QCB. This list is set forth in Figure 2.3-17 of the DEIR, in Section 2.3.3, page 2.3-33. The list includes past, present, and reasonably foreseeable future projects. The DEIR, Section 2.3.5.5, pages 2.3-46 and 47, provides the mitigation measures required for anticipated impacts to QCB. The Project's QCB Management/Enhancement Plan includes a description of the methods to monitor the species and provide enhancement of areas for which it is needed, and provides funding for the management plan in addition to the funding that will be provided for the Otay Ranch Preserve overall. These

measures as set forth in the QCB Management/Enhancement Plan, and the Project's onsite preservation and creation of QCB habitat at a 2:1 ratio will mitigate the Project's contribution to cumulative impacts to QCB and reduce impacts to a less than cumulatively considerable level. However, as noted in the DEIR, Section 2.3.5.8, page 2.3-52, the Project's cumulative impacts to QCB may also be addressed through the anticipated adoption of the proposed Quino Amendment to the MSCP. If such an amendment were adopted, it would supersede the Project's QCB Management/Enhancement Plan. Thus, either the Quino Amendment to the MSCP or the QCB Management/Enhancement Plan provides for the mitigation for cumulative impacts.

O-17-4 The commenter recommends that the County conduct "its own" review of the proposed Project's impacts on QCB. Please refer to Response to Comment O-6-3 regarding an independent analysis of QCB.

O-17-5 The commenter expressed concern that the Project will contribute to the loss of the Otay Mountain core habitat of QCB. The County does not agree with the commenter's position, and notes that the proposed Project is different from the Murrieta Hogbacks development in a number of important ways. As illustrated in Figure 2.3-13 of the DEIR, the proposed Project has connectivity to preserve areas to the north and south within which QCB is documented to occur, while the Hogbacks are a "cul de sac" configuration. The proposed Project's preserve area is approximately 1,089 acres, and the Project's QCB Management/Enhancement Plan identifies adequate funding for management and enhancement in perpetuity of QCB habitat within the Project's preserve area. In contrast, the Murrieta Hogbacks project does not contain a separate project-funded management and enhancement plan for QCB. Finally, the proposed Project was redesigned through extensive consultation with the wildlife agencies over 10+ years specifically for the continued preservation of QCB and San Diego fairy shrimp/vernal pools as described in more detail in Section 4 of the Biological Resources Technical Report. Please see Global Response R4: Quino Checkerspot Butterfly. Subsequent to public review of the 2015 DEIR, a new alternative, Alternative H, was introduced as a result of coordination with the Wildlife Agencies. Additional review of Alternative H was conducted and then released for public review in the spring of 2019. Information on Alternative H can be found in the recirculated Chapter 4.0 as well as Appendix D-3.

O-17-6 The County acknowledges and appreciates the comment. It will be included as part of the FEIR and considered by the decision makers. However, the comment provides concluding remarks and does not raise any new issue or include any new substantive comment concerning the adequacy of the DEIR. For that reason, the County provides no further response to this comment.